

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: SHARON WILLIAMS, : **CHAPTER 13**
:
Debtor. : **BKY. NO. 19-17528 (ELF)**
: **HEARING: 1/25/22 AT 10:00 AM**
: **COURTROOM #1**

DEBTORS' RESPONSE THE CHAPTER 13 TRUSTEE'S MOTION FOR DISMISSAL

The Debtor, Sharon Williams, hereinafter referred to as the “Debtor,” by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to the Chapter 13 Trustee’s Motion for Dismissal. For the reasons more fully set forth below, the Debtor submits that there is no basis for the Trustee’s Motion.

1. The Debtor avers that she is only one month behind on chapter 13 plan payments.
2. The Debtor should be able to catch up on the above missed payments by the end of January 2022 or file a Motion to Amend Post-Confirmation, if necessary.

WHEREFORE, the Debtor, Sharon Williams respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Trustee.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

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